

**NOTICE OF AMENDMENT**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

June 9, 1993

Mr. Charles Lowry  
Vice President, Operations  
Northern Border Pipeline Company  
P.O. Box 3330  
Omaha, NE 68103-0330

CPF No. 33104-M

Dear Mr. Lowry:

On December 16, 1992, a representative of the Iowa Department of Commerce, acting as an agent for the Central Region, Office of Pipeline Safety (OPS), pursuant to Section 14(c) of the Natural Gas Pipeline Safety Act, 49 U.S.C. app. § 1671 et. seq. (NGPSA), conducted an onsite pipeline safety inspection of Northern Border's facilities and records at Brookings, South Dakota. This letter confirms that inspection.

As a result of the inspection of your written operating and maintenance procedures, it appears that Northern Border has certain procedures which do not meet the requirements of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The inadequacies are as noted below:

**1. § 192.453 General.**

**Each operator is required to establish procedures to implement the requirements of Subpart I.**

**§ 192.467(a), of Subpart I, requires that each buried or submerged pipeline must be electrically isolated from other underground metallic structures, unless the pipeline and the other structures are electrically interconnected and cathodically protected as a single unit.**

**§ 192.467(c) of the regulation requires that except for unprotected copper inserted in ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures must**

be taken to minimize corrosion of the pipeline inside the casing.

OPS enforcement guidelines require that casings which cannot be practically isolated must be leak surveyed, with gas detection instruments, at the same frequency as the patrols required by § 192.705(b). That rule requires patrols at highway and railroad crossings twice a year at intervals not exceeding 7 1/2 months for Class 1 and Class 2 locations.

Northern Border's O&M procedure manual directs that shorted casings on cathodically protected pipelines are to be leak surveyed with leak detection equipment every two years. This policy does not meet the requirements for compliance with this regulation.

This letter serves to provide you with notice of the inadequate procedures and the response options as prescribed under Section 13 of the NGPSA and § 190.237, Title 49 C.F.R. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request an informal hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, you must prepare the appropriate amendments and provide a copy to the Director, Central Region, within thirty (30) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon  
Director, Central Region  
Office of Pipeline Safety